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***ALSO ADMITTED IN
KANSAS AND MASSACHUSETTS**

March 28, 2000

FEDERAL EXPRESS

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
301 West High R530
Jefferson City, Missouri 65102

FILED²
MAR 28 2000 *mk*
Missouri Public
Service Commission

Re: **Union Electric Company d/b/a AmerenUE**
Missouri PSC Case No. GR-2000-512

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) conformed copies of the Late Filed Application to Intervene of Midwest Gas Users' Association, which please file in the above matter and call to the attention of the Commission.

An additional copy of the material to be filed is enclosed, which kindly mark as received and return to me in the enclosed envelope as proof of filing.

Thank you for your attention to this important matter. If you have any questions, please call.

Sincerely yours,

FINNEGAN, CONRAD & PETERSON, L.C.

By: 

Stuart W. Conrad

SWC:s
Enclosures
cc: All Parties per Service Certificate

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

MAR 28 2000

Missouri Public
Service Commission

In the Matter of Union Electric)
Company d/b/a AmerenUE for Authori-)
ty to File Tariffs Increasing Rates)
for Gas Service Provided to Custom-)
ers in the Company's Missouri Ser-)
vice Area)

GR-2000-512

LATE-FILED APPLICATION TO INTERVENE
OF MIDWEST GAS USERS' ASSOCIATION

Comes now MIDWEST GAS USERS' ASSOCIATION ("Midwest") and pursuant to 4 C.S.R. 240-2.075 applies to intervene herein and become a party hereto in respect to the above matter. In support thereof, Midwest respectfully states:

1. Midwest is an unincorporated non-profit association consisting of and representing its membership of business concerns and corporations which are substantial users of natural gas at their plants situated in such states as Kansas, Missouri and Oklahoma of which numerous members have plants and facilities which are located in and consume natural gas within the State of Missouri. As currently required by 4 CSR 240-2.075(3), a listing of Midwest' member firms and participants is attached hereto as Appendix A.^{1/}

2. Midwest's interest on behalf of its members and participants in proceedings affecting the rates, terms and

^{1/}Those companies specifically supporting this effort at this time are ABB Power T & D Systems, Inc. Authorization from several other companies is currently in process within those concerns. Midwest will promptly advise the Commission and AmerenUE of additional participants in Midwest's intervention as they are added.

conditions of natural gas service has been repeatedly recognized by the Missouri Public Service Commission in permitting Midwest's intervention in proceedings affecting Missouri Gas Energy and its predecessors, the Missouri Public Service Company, in the prior rate case of AmerenUE, GR-98-393, and in various generic dockets involving the terms and conditions of natural gas transportation and purchased gas adjustment clauses for natural gas companies in the State of Missouri. Furthermore, Midwest's interest in proceedings affecting natural gas rates, and the terms and conditions of natural gas service has been recognized by the Federal Power Commission and the Federal Energy Regulatory Commission in granting Midwest's intervention in numerous dockets concerning Williams Natural Gas Pipeline Company, Panhandle Eastern Pipe Line Company, and in other generic dockets concerning the terms and conditions of natural gas service, including Orders 436, 500, 451, 528, and Order 636.

3. On or about February 18, 2000 Union Electric Company d/b/a AmerenUE (UE) filed proposed tariffs reflecting an overall annual revenue increase of \$12 million for its Missouri service area. Approval of several other modifications to transportation tariffs were also requested by UE, which changes may affect the costs incurred by Midwest members and participants to transport their natural gas supplies through UE facilities.

4. As major customers of UE, Midwest participants and members will be affected by the outcome of this docket to a material but as yet undetermined extent.

5. Because UE transports gas for consumption to Midwest members under separate rate schedules and because of the size of Midwest's members, Midwest is in the special position of representing interests which will not and cannot be represented adequately by any other party and which interest is direct and immediate and different than those of the general public. Therefore, it will aid the Commission and protect the public interest that Midwest be permitted to intervene in this proceeding so as to protect interests which no other party is in a position properly to protect and adequately represent herein.

Cause for Late Filing

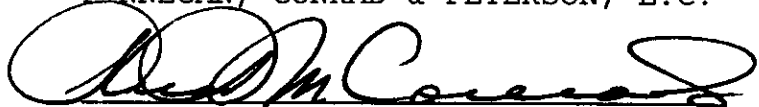
6. The Commission's Order of March 3, 2000, directed interventions to be filed by March 23, 2000. Although provided a copy of the Company's filing, unavailability of personnel necessary to analyze the impact of that filing and make decisions regarding intervention due to previously scheduled leave and business travel and leave has delayed receipt of formal authorization for this intervention. This intervention is submitted on March 28, 2000, two (2) business days following the due date previously ordered by the Commission, but is nevertheless within the thirty (30) day period otherwise established by 4 CSR 240-2.075(1). In addition, counsel for UE has been contacted and has stated that UE has no objection to this application to intervene being late-filed. It is not believed that any significant action has occurred in this case that this intervention would disrupt, delay or impede and no prejudice to any party could or will

result from allowing this application to intervene to be late-filed.

WHEREFORE, Midwest prays: (a) that Midwest be permitted to intervene herein and be made a party hereto with all rights to have notice of and participate in hearings to present evidence, cross-examine witnesses, file briefs and participate in argument, should any be had; and (b) for all other needful and proper relief.

Respectfully submitted,

FINNEGAN, CONRAD & PETERSON, L.C.



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ATTORNEYS FOR MIDWEST GAS USERS'
ASSOCIATION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition for Leave to Intervene by U.S. mail, postage prepaid addressed to all parties by their attorneys of record as disclosed by the pleadings herein.



Stuart W. Conrad

Dated: March 28, 2000

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03/27/00 5:03pm

APPENDIX A

A D Mohr Farms
A G Processing Inc.
ABB Power T & D Corporation
Alameda Plaza Inc.
Alameda Towers
American Bakeries Co.
American Beauty Macaroni
Archer Daniels Midland Company
Ark City Packing Co.
Banquet Foods Corporation
Baptist Medical Center
Bayer, Inc.
Bethany Hospital
Blueside Company
BMA
Bowen Construction Co.
Butler Manufacturing Co.
Cargill, Inc.
Castlegate Ind. Inc.
Certain-Teed Products Inc.
Chesebrough-Ponds, Inc.
City of Osborne
City of Holton
City of Minneapolis
City of Independence, Missouri
City of Palmyra
City of Ottawa
City of Beloit
City of Baldwin
City of Ossawatimie
City of Sabetha
City of Horton
City of Lincoln
City of Augusta
Coleman Alfalfa
Colgate Palmolive
Continental Baking Company
Cook Paint & Varnish
Corn Products Company
Doanes Products
Empire Cold Storage
Fairbanks Morse Pump
Fairbanks Morse & Co.
Fairmont C. C. Dairy
Fasco Products, Inc.
Faultless Laundry
Ford Motor Co.
Fox Run Apartments
Friskies Petcare Division
Frito Lay
Gaines Foods
General Mills

Griffin Wheel
Grinstead Products, Inc.
GST Steel Company
Guardian Management Inc.
Gulf & Western Mfg.
Guys Foods Inc.
Hallmark Cards
Hamm Asphalt Inc.
Harvest Brand Inc.
Hercules, Inc.
Hills Pet Food Division
Hills Division of Riviana
Hospital Linen Service
Hudson Foods, Inc.
Hudson Farms
Hudson Food Protein
ICI Explosives USA, Inc.
J C Nichols Co.
Kansas City Terminal Railway
Koppers Co. Inc.
Krause Milling Co.
Lafarge Corporation
Lawrence Paper Company
Leggett & Platt
M F A Milling
M K T Railroad
Hoeschst Marion Roussel
Maytag Corporation
McNally Pittsburg
Medical Center of Independence
Menorah Medical Center
Mid-America Dairymen
Midwest Conveyor
Midwest Grain Products
Milnot Compay
Mission Clay Products
Missouri Steel Castings
Missouri Plating Co.
Modine Manufacturing Company
National Starch Company
National ByProducts
North Kansas City Memorial
Hospital
O'Sullivan Industries
Owens Corning Fiberglas
Pet Milk Co.
Philadelphia Quartz Co.
Pittsburgh Corning
Proctor & Gamble Co.
Quaker Oats
Ralston Purina Co.
Reichhold Chemical Inc.

Research Hospital
Reynolds Metals Co.
Rival Manufacturing Co..
Safeway Stores
Santa Fe Railroad
Sealright Mfg. Co.
Sears Roebuck & Co.
Seitz Foods Inc.
Southwest Oil & Grease
Sperry Vickers
St. John's Hospital
St. Joseph Light & Power
St. Joseph's Center
St. Francis Hospital
St. Mary's Hospital
St. Joseph, Missouri
St. Joseph's Hospital
St. Lukes Hospital
Stahl Specialty Co.
Standard Refining
Steffen Dairy
Swift and Company
Swift Ind. Packing Co.
Teva Pharmaceuticals, Inc.
Thomas J. Lipton Inc.
Thompson Industries
Tower Metal Products
Town of Carrolton
TransWorld Airlines
Trigen - Kansas City District
Trinity Lutheran Hospital
Trumbull Asphalt
U S Gypsum
Vance Brothers Asphalt
W S Dickey Clay Co.
W R Grace & Co.
Wells Aluminum Inc.
Winchester Foods Inc.
Wire Rope Corporation